

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	Chapter 11
In re:)	
)	Case No. 21-10529 (DSJ)
NINETY-FIVE MADISON COMPANY, L.P.,)	
)	
Reorganized Debtor.)	
)	

**JOINT STIPULATION EXTENDING TEMPORARY INJUNCTION
AGAINST PROSECUTION OF CLAIMS**

Reorganized Debtor Ninety-Five Madison Company, L.P. (“NFMC”) and the Estate of Lois Weinstein (the “Weinstein Estate” and, with NFMC, the “Parties”) through their respective counsel, hereby stipulate (this “Stipulation”) and agree, subject to this Court’s approval, as follows:

1. WHEREAS, NFMC and the Weinstein Estate are parties to that certain state court proceeding captioned *Ninety-Five Madison Company, LP v. Kinder Realty Associates et al.*, Index No. 653034/2024 (the “New York Action”);

2. WHEREAS, on February 12, 2025, this Court entered the *Order Granting Reorganized Debtor Ninety-Five Madison Company, L.P.’s Motion to Enforce the Plan Injunction and Confirmation Order* [Dkt. No. 414] (the “Injunction Order”);

3. WHEREAS, Paragraph 2 of the Injunction Order provides that the Weinstein Estate is “enjoined for thirty (30) days commencing on the date hereof from continuing to prosecute any claim or cause of action seeking a judicial declaration or injunction in the New York Action that (i) the Reorganized Debtor was or is legally dissolved; (ii) the Reorganized Debtor, including its management, are without authority to continue the operation of the business of the Reorganized Debtor; and (iii) the Weinstein Estate or any other limited partner is entitled to an immediate

distribution of funds from the sale proceeds of the Property” (the foregoing Paragraph 2 of the Injunction Order, the “Claims Injunction”);

4. WHEREAS, Paragraph 1 of the Injunction Order provides that the Parties “are to inform the Court whether they wish to pursue additional relief and, if so, whether and on what schedule they wish to file additional papers, and to be heard”;

5. WHEREAS, thirty (30) days after the date of the Court’s entry of the Injunction Order is March 14, 2025;

6. WHEREAS, the Parties continue to negotiate a mutually acceptable resolution of the disputes between them and believe that they would benefit from additional time to continue negotiations;

7. WHEREAS, the Parties have conferred and have agreed to a limited extension of the Claims Injunction to March 31, 2025;

8. **NOW, THEN, IT IS HEREBY STIPULATED AND AGREED**, by the Parties, through their undersigned counsel and subject to the approval of the Court, that:

- a. The Claims Injunction as provided in Paragraph 2 of the Injunction Order is extended to March 31, 2025.
- b. This so-ordered Stipulation shall be effective and enforceable immediately upon entry.
- c. The Parties’ rights are reserved with respect to the Injunction Order, including the right to request additional extensions of the Claims Injunction, and the Parties do not waive any defenses.
- d. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this so-ordered Stipulation.

[Execution Page Follows]

Date: New York, New York
March 10, 2025

JEFFREY A. BARR

By: /s/ Jeffrey A. Barr

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Counsel to Ninety-Five Madison Company, L.P.

Date: _____

SO ORDERED:

HONORABLE DAVID S. JONES
UNITED STATE BANKRUPTCY JUDGE